

Privacy Notice

Introduction

In this Privacy Notice, “Pachulski Stang Ziehl & Jones,” “PSZJ,” “we,” and “us” refers to Pachulski Stang Ziehl & Jones LLP, a limited liability partnership organized under the laws of Delaware, U.S., and other affiliated entities.

This Privacy Notice describes the ways in which we process personal information. We may amend or update it from time to time. We encourage you to read this Privacy Notice.

PSZJ is the data controller of the Personal Information we process that originates in various jurisdictions—including, among others, the United States, and various other international jurisdictions, and is therefore responsible for processing Personal Information in compliance with applicable data protection laws.

For additional information about your rights and choices under applicable law, please review “Your Rights.”

Personal Information We Collect

For purposes of this Privacy Notice, “Personal Information” means any information that—by itself or in combination with other information—identifies, relates to, describes, references, is capable of being associated with, or can reasonably be linked, directly or indirectly, to an individual, a device, or a household. Personal Information does not include information that is anonymized or information otherwise excluded from relevant data protection laws. The categories of Personal Information PSZJ collects may include Contact Information, Applicant Information, Employment Information, Compliance Data, Client Service Data, Marketing Information, Technological Information, Special Categories of Personal Data, other Sensitive Personal Information, and Other Data, all as described in more detail in the table below:

CONTACT INFORMATION	APPLICANT INFORMATION	EMPLOYMENT INFORMATION
<ul style="list-style-type: none"> Name Home address Telephone numbers E-mail address Demographic data 	<ul style="list-style-type: none"> Data provided by job applicants through channels for advertising employment opportunities and for employment applications Data provided by job applicants in connection with an application for employment or to provide services to PSZJ 	<ul style="list-style-type: none"> Title Organization Work address
COMPLIANCE DATA	CLIENT SERVICE DATA	MARKETING INFORMATION
<ul style="list-style-type: none"> Documentation confirming identity, such as a passport or driving license Date of birth Documentation confirming status 	<ul style="list-style-type: none"> Personal information received from clients in respect of employees, customers, or other individuals known to clients Matter details—including 	<ul style="list-style-type: none"> Details of your communications with us Marketing preferences Event registration and attendance details

- as a director of a company or other corporate vehicle
- Documentation confirming status as a beneficial owner of a company or other corporate vehicle
- Financial information, including bank account details
- Tax information
- correspondence, transaction documents, evidence that are processed while providing services, and legal advice
- Invoicing/payment details and payment history
- Client feedback
- Credentials
- Associations
- Participation in conferences and seminars
- Dietary requirements and related preferences
- Subscriptions
- Downloads
- User names and passwords

OTHER	TECHNOLOGICAL INFORMATION	SPECIAL CATEGORIES OF PERSONAL INFORMATION
<ul style="list-style-type: none"> Photographs Consent records (and subject matter of consent) Social media details, views, and opinions shared on social media Language preference Hobbies and interests Any information that you or a third party provide to us or make public 	<ul style="list-style-type: none"> IP address Device type Operating system Browser type Browser settings Language settings Dates and times of connecting to a site Technical communications information Username, password, security login details Cookies Usage data 	<ul style="list-style-type: none"> Health data (relating to both physical and mental conditions or any disability) Racial or ethnic origin Religious or other beliefs Sexual orientation Details of trade union membership

When we process Special Categories of Personal Data or Sensitive Personal Information, our legal basis is compliance with applicable laws and our professional obligations; detection and prevention of crime; establishment, exercise, or defense of legal rights; performance of a contract; or your explicit consent.

Sources of Personal Information

We collect Personal Information from many sources. It may come directly from individuals (data subjects), indirectly from individuals (i.e., interactions with the website), or from clients, colleagues, and publicly available sources.

As a law firm, we regularly receive Personal Information in connection with the provision of our services and as part of our professional activities. For example, we may collect Personal Information:

- As part of our business intake procedures
- When processing employee or employment candidate or independent contractor Personal Information
- When clients and prospective clients seek legal advice
- When providing legal services to our clients (in connection with which we provide our clients in various jurisdictions, including the U.S., with additional information about how we process Personal Information);
- That is publicly available (e.g., social media)

- When it is required for the provision of services from our vendors
- When individuals browse or interact with our website at www.pszjlaw.com (the “Site”) or use any of our online services, including registration details when you use, or register to use, any of our sites, apps, or services
- From third parties who provide it to us
- In carrying out our business, including records of interactions or correspondence with PSZJ, including your attendance and participation at events or meetings we hold (including when we record such events or meetings, of which you will be provided notification, where applicable)
- In connection with any application for employment or interviews if you apply for a role with us and take part in an interview or selection process
- When individuals email us or provide Personal Information to us in other circumstances, such as requesting details about or attending and participating in a firm-sponsored event.

The Purposes of Processing Personal Information

We will process Personal Information only for the purposes set out below, as well as other purposes for which you give your consent. We will not process the Personal Information we collected about you for materially different, unrelated, or incompatible purposes without providing you notice or, where required by law, obtaining your consent.

When processing your Personal Information, we may rely on one or more lawful bases, including, not by way of limitation, our legitimate business interests. Legitimate business interests involve processing activities that are necessary for our business operations and objectives, provided that these activities do not adversely affect your fundamental freedoms and rights. In determining whether legitimate business interests apply, we carefully evaluate and document our rationale.

Specifically, we consider the necessity and proportionality of the processing and we are transparent in communicating how we use your Personal Information. We also assess whether our interests appropriately balance with your data-protection rights and expectations. We will not process your Personal Information under the legitimate business interests grounds if our interests are overridden by potential risks to your individual privacy or if you object to our processing of your Personal Information.

Purpose of Processing	Legal Basis for Processing
Providing legal services and responding to requests for legal services	<ul style="list-style-type: none"> • Performance of a contract, including steps taken in anticipation of entering a contract • Legitimate business interests • Compliance with a legal obligation to which we are subject
Providing information relating to our services either in response to specific requests or generally to develop our business	<ul style="list-style-type: none"> • Legitimate business interests • Consent

Managing business operations and administering client relationships, including processing transactions and payments and to prevent fraud	<ul style="list-style-type: none"> • Performance of a contract • Legitimate business interest
Meeting our legal, compliance, and regulatory obligations	<ul style="list-style-type: none"> • Compliance with a legal obligation to which we are subject
Responding to complaints	<ul style="list-style-type: none"> • Compliance with a legal obligation to which we are subject
Providing legal updates and information in relation to events which we believe may interest you	<ul style="list-style-type: none"> • Legitimate business interest • Consent
Communicating with you	<ul style="list-style-type: none"> • Legitimate business interest • Consent
Managing human resources	<ul style="list-style-type: none"> • Performance of a contract • Compliance with a legal obligation to which we are subject • Consent
Marketing	<ul style="list-style-type: none"> • Legitimate business interest • Consent
Making appropriate business development plans to better support our clients' needs for legal services	<ul style="list-style-type: none"> • Legitimate business interest
Improving the functionality of our website and supporting IT requirements including, but not limited to, information security	<ul style="list-style-type: none"> • Legitimate business interest
Protecting us against, identifying, and preventing fraud and other unlawful activity, claims, and other liabilities	<ul style="list-style-type: none"> • Legitimate business interest • Compliance with a legal obligation to which we are subject

To Whom We Disclose Personal Information

We may disclose Personal Information to the following categories of third parties:

- Our affiliates (such as subsidiaries that we may own)
- Service providers: We use services providers such as website-hosting and management companies, recruiting services and software providers, data-storage and data-analysis companies, electronic-discovery vendors, event organizers, and marketing-technology companies. Our data-processing agreements with these service providers will describe the purpose of the processing, will not permit them to use Personal Information for any purposes other than as is required to perform the function for which they have been retained, and will commit them to comply with applicable data-privacy laws and regulations
- Our clients, as it relates to our professional services offerings
- Our auditors and professional advisers

- Our professional indemnity insurers
- Parties to a corporate transaction or proceeding: In the event of a corporate sale, merger, reorganization, bankruptcy, dissolution, or similar event, Personal Information may be part of the transferred assets
- Public authorities and legal proceedings: We may disclose Personal Information about you to government or law-enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern the Site; (d) protect our rights, privacy, safety or property, and/or that of you or others; and (e) protect, investigate, and deter against fraudulent, harmful, unauthorized, unethical, or illegal activity

We may also disclose any information, including Personal Information, as we deem necessary, in our sole discretion, to comply with a subpoena, any applicable law, regulation, legal process, or governmental request.

How We Protect Personal Information

PSZJ has appropriate physical, technical, and administrative safeguards in place designed to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. You should keep in mind, however, that no internet transmission is ever 100% secure or error-free. In particular, e-mail sent to or from our website may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. Please also read our Disclaimer before sending any information to us.

How Long We Retain Personal Information

Personal Information will be retained by PSZJ for as long as the information is required to fulfill our legitimate business needs or the purposes for which the Personal Information was collected, or for as long as is required by law.

California Residents

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (CPRA) of 2020, provides California residents with several consumer privacy rights. These rights include:

- Right to access
- Right to correct
- Right to delete
- Right to opt out of automated decision-making (certain industries)
- Right to opt out of the selling or sharing of Personal Information

- Right to limit the use of sensitive personal information about you
- Right to Nondiscrimination

Your Rights

Depending on the country or U.S. state in which you reside, you may have various rights relating to Personal Information about you. These rights include:

- Right to confirm whether we are processing Personal Information about you
- Right to access Personal Information about you: You have the right to confirm what Personal Information we are processing on you and to access the Personal Information, including: the categories of Personal Information; the categories of sources from which the Personal Information is collected; the business or commercial purpose for collecting or selling Personal Information and/or sensitive Personal Information; the categories of third parties to whom we disclose Personal Information; and the specific pieces of Personal Information we have collected about you
- Right to correct inaccuracies in the Personal Information about you and the right to delete Personal Information about you: Subject to certain exceptions, you have the right to request the deletion of Personal Information that we have collected about you
- Right to restriction of processing: In certain circumstances, you have the right to restrict the processing of Personal Information about you
- Right to delete Personal Information: In certain circumstances you can request us to delete the Personal Information that we process about you
- Right to data portability: You have the right to request a copy of Personal Information, if it exists in a digital format, that you previously provided to us; we will provide the copy to use in a portable—and, to the extent technically feasible—readily usable format that allows you to transfer the Personal Information to another data controller without hindrance
- Right to opt out of receiving marketing emails: You can request that we send you marketing information and sign up for electronic newsletters and client alerts; you can also request that we stop sending you marketing or other promotional communications through the opt-out link in any of these communications or by using the information provided in Contact Us
- Right to opt out of the processing of Personal Data for the purposes of:
 - Targeted advertising
 - Selling (for both monetary and other valuable consideration)
 - Use of automated decision-making, including profiling (“In furtherance of a decision that produces a legal or similarly significant effect”)

Residents of certain jurisdictions and their authorized agents can submit requests to exercise their rights described above for our review.

We may request additional information to verify the authenticity of your request, including confirming Personal Information that you have already provided to us, or potentially requesting additional Personal Information. We will provide you with confirmation of our receipt of your request within 10 business days. We will work diligently to satisfy your request without undue delay, but no later than 45 calendar days. We may request up to an additional 45 calendar days to honor your request, depending on its complexity. Consumers intending to exercise their rights described above should submit a verifiable request to us by either: Calling us at 310-277-6910, or via e-mail at info@pszjlaw.com.

If we deny any of your rights granted under privacy laws, you may have the right to appeal the decision with us. If you would like to appeal a prior decision, please e-mail us and include 'Appeal' in the subject line, along with the prior request and related communications. We will notify you in writing of any action taken or not taken in response to your appeal not later than the 60th day after receiving your appeal. We will include a written explanation of the reason or reasons for our decision. You can send your appeal to us following the instructions located below, in the "Contact Us" section. Additionally, you may contact the Attorney General or the supervisory authority of the state or country in which you reside if you have concerns about the results of the appeal.

Web Tracking

Cookies

A "cookie" is an element of data that a website can send to your browser, which may then be stored on your system. PSZJ uses different kinds of cookies on the Site.

Do-Not-Track Signals

Your browser may allow you to send "do-not-track" requests to websites you visit. If you enable this feature and your browser sends a "do-not-track" request, the Site will respond by deactivating all nonessential cookies set on the Site.

Google Services

On the Site, PSZJ uses several services provided by Google:

GOOGLE ANALYTICS

This Site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google").

Google Analytics uses "cookies," which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Please note that, for the Site, we activated the IP anonymization; i.e., Google will truncate/anonymize the last octet of your IP address to ensure an anonymized collection of IP addresses (IP Anonymization). In exceptional cases only, the full IP address is sent to and shortened by Google servers in the USA.

On behalf of the website provider, Google will use this information for the purpose of evaluating your use of the Site, compiling analytics, demographics, and interest reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider. Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the firm website.

Furthermore, you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in publicly available.

GOOGLE MAPS

Additionally, because we use visual mapping services on the Site, please be aware that the Google Maps/Earth Terms of Service, including the Google Privacy Notice, also applies.

Third-Party Sites

Our Site may contain links to other third-party sites. When you click on one of these links you are visiting a website operated by someone other than PSZJ, and the operator of that website may have a different privacy notice. PSZJ is not responsible for their individual privacy practices. We encourage you to investigate the privacy notices of these third-party operators.

Revisions to This Privacy Notice

PSZJ reserves the right to change this Privacy Notice at our discretion and at any time. Please check this Privacy Notice regularly. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

Contact

You may contact the firm at info@pszjlaw.com. You can submit your individual requests in the "Submit Your Request" section at info@pszjlaw.com.

The Site is owned and operated by Pachulski Stang Ziehl & Jones LLP.